

SOUTHWEST AIRLINES
POLICY CONCERNING HARASSMENT, SEXUAL HARASSMENT, DISCRIMINATION & RETALIATION

Issued by Southwest Airlines 2017; Effective Until/Unless Reissued

Southwest Airlines prohibits any and all types of harassment, sexual harassment, discrimination and/or retaliation against Employees by Leaders, fellow Employees, or third parties. Harassment or discrimination based on race, color, ancestry, religion, age, sex, sexual orientation, gender, gender expression, gender identity, pregnancy, marital status, national origin, physical or mental disability, military and veteran status, genetic information, medical condition, or any other legally protected status, negatively affects morale, motivation, and job performance. Such behavior is inappropriate, offensive, and will not be tolerated.

EXAMPLES OF TYPES OF DEROGATORY, SEXUALLY SUGGESTIVE, OFFENSIVE, THREATENING, INTIMIDATING, HOSTILE OR RETALIATORY CONDUCT THAT ARE PROHIBITED

- verbal comments, including voicemail or recorded statements;
- written comments including, email, text messages, or social media online posts;
- unwanted physical behavior including pats, squeezes, deliberate brushing against someone's body, impeding/blocking normal work or movement, or unwanted sexual advances;
- displaying or forwarding messages, photos, graffiti, pictures, cartoons, drawings, social media posts, or online comments, including displaying such content at one's own work area, computer, or mobile device;
- epithets or slurs are always offensive and will not be tolerated for any reason, even if an Employee mistakenly believes such epithets to be a funny part of a joke or prank; and
- basing or threatening to base any employment decision (such as an Employee's performance evaluations, work assignments, or advancement) upon an Employee's submission to harassing behavior.

REPORTING & INVESTIGATIONS

Employees have a duty to promptly and accurately report any actual, threatened, or perceived incidents of harassment, sexual harassment, discrimination, or retaliation to their Supervisor, Manager, Director, Vice President, or the Employee Relations Team. Leaders who are made aware of harassment, sexual harassment, discrimination or retaliation concerns or complaints should immediately contact Employee Relations in the General Counsel Department at HDQ.

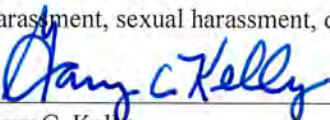
All complaints should be referred to Employee Relations, the Team designated by Southwest to conduct, document and track all investigations under this Policy. Employee Relations will investigate all referred complaints promptly, impartially, and discreetly.

- Employees are encouraged to participate in investigations and are expected to refrain from discussing the investigation with other Employees.
- Upon completion of an investigation, the appropriate parties will be notified that the investigation is completed.
- Information obtained by Southwest through the complaint/investigation process will generally be treated confidentially except for what is required to properly investigate complaints, take appropriate responsive actions, or as otherwise required by law or business necessity.
- Any Employee who has been found to have acted inappropriately against another Employee in violation of this policy will be subject to appropriate corrective action up to and including termination.
- If after investigating a complaint Southwest determines that the complaint was not made in good faith or that an Employee has provided false information, appropriate corrective action up to and including termination may be taken.

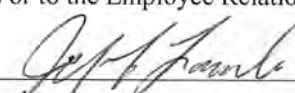
RETALIATION IS PROHIBITED

Retaliation typically involves adverse actions against an individual engaging in protected activity. Protected activity involves an Employee asserting his/her right to be free from employment discrimination and/or harassment. Examples include making a complaint under this policy and/or participating in an investigation under this policy. Negative comments (verbal or written), negative behavior, or adverse employment actions toward someone who has engaged in protected activity is strictly prohibited.

It is expected that Employees of Southwest Airlines will act responsibly to maintain a positive working environment, free of harassment, sexual harassment, discrimination and retaliation, and free of hostile, threatening, or intimidating behavior, allowing each Employee to perform at his/her maximum potential. Southwest Airlines encourages any Employee to bring any questions regarding harassment, sexual harassment, discrimination, or retaliation to his/her Leaders or to the Employee Relations Team.



Gary C. Kelly
Chairman of the Board, President & Chief Executive Officer



Jeff Lamb
EVP Corporate Services

Southwest Airlines is also a federal government contractor committed to the Company's Goals for Success and Affirmative Action Plans for each work location. Southwest Airlines is committed to providing equal employment opportunities to females, minorities, persons with disabilities and covered veterans, and other qualified persons of all backgrounds, with such efforts coordinated by the People Department.

All phases of employment, including recruitment, hiring, evaluation, promotion, transfer, assignment, training, benefits, and separation shall be conducted in compliance with equal employment opportunity laws and regulations.

2.3.0 Southwest Airlines Co. Policy Concerning Harassment, Sexual Harassment, Discrimination & Retaliation

Revised: 04/23/2014

Southwest Airlines prohibits any and all types of harassment, sexual harassment, discrimination and/or retaliation. Harassment or discrimination based on race, color, religion, age, sex, sexual orientation, gender identity, pregnancy, marital status, national origin, disability, veteran status, genetic information, or any other legally protected status, negatively affects morale, motivation, and job performance. Such behavior is inappropriate, offensive, and will not be tolerated. Any type of retaliation for reporting or assisting or participating in an investigation regarding harassment, sexual harassment, discrimination, or retaliation is also strictly prohibited. Behavior in violation of this policy is contrary to the Southwest Spirit, the Southwest Culture, and may violate state and/or federal antidiscrimination laws.

By way of example, prohibited conduct that may be considered harassment or discrimination may include unwelcome or inappropriate:

- Verbal comments or remarks that are derogatory, sexually suggestive, offensive, threatening, intimidating and/or hostile;
- Physical behavior such as pats, squeezes, deliberate brushing against someone's body, impeding or blocking normal work or movement, unwanted sexual advances, or unwanted touching;
- Visual harassment such as displaying messages, photos, graffiti, pictures, cartoons, or drawings, even at one's own work station, that are derogatory, sexually suggestive, offensive, threatening, intimidating and/or hostile;
- Written comments or remarks including, email, voicemail, text messages, and posts on online social media that are derogatory, sexually suggestive, offensive, threatening, intimidating and/or hostile.

**FLIGHT ATTENDANT WORK RULES AND
EXPECTATIONS / COMPANY POLICIES****COMPANY POLICIES AND PROGRAMS**

Epithets or slurs are always offensive and will not be tolerated for any reason, even if an Employee mistakenly believes them to be a funny part of a joke or prank. Likewise, basing or threatening to base any employment decision (such as an Employee's performance evaluations, work assignments, or advancement) upon an Employee's submission to harassing behavior in the workplace is strictly prohibited.

Retaliation typically involves actions against an individual engaging in protected activity and, by way of example, may include comments (verbal or written), behavior, or adverse employment actions towards someone based upon a complaint made under this policy, an investigation conducted under this policy, and/or a person's involvement in an investigation under this policy.

Employees have a duty to promptly and accurately report any actual, threatened, or perceived incidents of harassment, sexual harassment, discrimination, or retaliation to their Supervisor, Manager, Director, Vice President, or the Employee Relations Team. Leaders who are made aware of harassment, sexual harassment, discrimination or retaliation concerns or complaints should immediately contact Employee Relations in the General Counsel Department at Headquarters.

All complaints will be investigated promptly, impartially, and discreetly. If asked to do so, Employees are encouraged to participate in investigations and are expected to maintain confidentiality. Upon completion of an investigation, the appropriate parties, including the complainant, will be notified of the investigation results. Information obtained by Southwest Airlines through the complaint/investigation process will generally be treated in confidence except for that which is required to properly investigate complaints, take appropriate responsive actions, or as otherwise required by law or business necessity. Any Employee who has been found to have acted inappropriately against another Employee in violation of this policy will be subject to appropriate corrective action up to and including termination. If after investigating a complaint Southwest determines that the complaint was not made in good faith or that an Employee has provided false information, appropriate corrective action up to and including termination may be taken against the individual who made the bad faith complaint or who provided false information.

It is expected that Employees of Southwest Airlines will act responsibly to maintain a positive working environment, free of harassment, sexual harassment, discrimination and retaliation, and free of hostile, threatening, or intimidating behavior, allowing each Employee to perform at his/her maximum potential. Southwest Airlines encourages any Employee to bring any questions regarding harassment, sexual harassment, discrimination, or retaliation to his/her Leaders or to the Employee Relations Team.